

**UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH,
Individually and as Parent and Legal
Guardian of W.W., K.W., G.W., and
L.W., minor children, and
MATTHEW WADSWORTH,

Plaintiffs,

v.

WALMART, INC. and JETSON
ELECTRIC BIKES, LLC,

Defendants.

Case No.: 2:23-cv-00118-NDF

JURY TRIAL DEMANDED

PLAINTIFFS' MOTION FOR ADMISSION TO APPEAR PRO HAC VICE

Pursuant to Local Rule 84.2(b), Plaintiffs Stephanie Wadsworth, Individually and as Parent and Legal Guardian of W.W., K.W., G.W., and L.W., minor children and Matthew Wadsworth, by and through their undersigned counsel, respectfully submit the following Motion to grant attorney Rudwin Ayala permission to appear *pro hac vice*.

1. I, Taly Goody, an attorney with Good Law Group, P.A., 58 Malaga Cove Plaza, Palos Verdes Estates, CA 90274, Email: taly@goodylawgroup.com, telephone number (310) 893-1983, am counsel for the Plaintiffs in the above-captioned matter.
2. I, Taly Goody, certify I am a member in good standing with the Wyoming Bar Association and the U.S.D.C. District Court of Wyoming Bar. My Wyoming Bar

Number is 8-6737. I was admitted to practice in the District Court of Wyoming on June 30, 2023.

3. Movant, Rudwin Ayala, is an attorney with Morgan & Morgan, P.A., 1700 Palm Beach Lakes Blvd., Suite 500, West Palm Beach, FL 33401, Email: rayala@forthepeople.com, telephone number (561) 764-2220.
4. To the best of my knowledge and belief, Mr. Ayala is of good moral character. He is an attorney duly licensed and in good standing with the Florida State Bar, admitted on September 21, 2010. He has never been denied *pro hac vice* admission or had admission revoked in any court. Mr. Ayala has never been disciplined or sanctioned by any court.
5. As local counsel, I affirm that I shall be fully prepared to represent the client at any time, and in any capacity.

ACCORDINGLY, Plaintiffs respectfully moves the Court to enter an Order permitting Rudwin Ayala to appear in this matter *pro hac vice*.

Date: November 8, 2023

Respectfully Submitted,

/s/ Taly Goody, Esq.

TALY GOODY, Esq.

Wyoming Bar No.: 8-6737

GOODY LAW GROUP

58 Malaga Cove Plaza

Palos Verdes Estates, CA 90274

Telephone: (310) 893-1983

Primary Email:

Taly@GoodyLawGroup.com

RUDWIN AYALA, ESQ.**

Florida Bar No. 0084005

MORGAN & MORGAN, P.A.

1700 Palm Beach Lakes Blvd., Suite 500

West Palm Beach, FL 33401

Telephone: (561) 764-2220

Primary Email:

rayala@forthepeople.com

Secondary Email:

csmaya@forthepeople.com

T. MICHAEL MORGAN, ESQ.*

Florida Bar No.: 062229

MORGAN & MORGAN, P.A.

20 N. Orange Ave., Suite 1600

Orlando, FL 32801

Telephone: (407) 420-1414

Primary Email:

mmorgan@forthepeople.com

Secondary Email:

akelseyflowers@forthepeople.com

EITAN GOLDROSEN, ESQ*.

Florida Bar No. 1025140

MORGAN & MORGAN, P.A.

20 N. Orange Ave., Suite 1600

Orlando, FL 32801

Telephone: (407) 420-1414

Primary Email:

egoldrosen@forthepeople.com

Secondary Email:

rhansch@forthepeople.com

GREYSON GOODY, ESQ.*

California Bar No.: 292527

GOODY LAW GROUP

58 Malaga Cove Plaza

Palos Verdes Estates, CA 90274

Telephone: (310) 893-1983

Primary Email:

Greyson@GoodyLawGroup.com

***Pro Hac Vice Pending*
**Pro Hac Vice*
Counsel for the Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 8, 2023, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Taly Goody
Taly Goody